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Attorney for Plaintiff.

UNITED STATES DISTRICT COURT FOR THE  
 NORTHERN DISTRICT OF CALIFORNIA

GURMEET SINGH,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND  
 SECURITY, ET AL,

Defendants.

No. C 07-02202 JCS

**STIPULATION TO EXTEND DATES;  
 [PROPOSED] ORDER**

Plaintiff, by and through his attorney of record, and Defendants, by and through their attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. The plaintiff filed an action in this Court on April 23, 2007, seeking review of the decisions by the U.S. Citizenship and Immigration Services ("USCIS") to deny his Form I-485 application for adjustment of status and the Form I-730 petitions that the plaintiff filed on behalf of his wife, step-son, and son.

2. Pursuant to a stipulation signed by this Court on October 3, 2007, the parties agreed to file cross-motions for summary judgment by November 12, 2007; to file cross-oppositions by November 26, 2007; to file cross-replies by December 3, 2007; and to participate in a hearing on February 15, 2008.

3. The parties agreed that USCIS will *sua sponte* reopen the I-485 and I-730 proceedings to address whether, pursuant to 72 Fed. Reg. 9958-01 (March 6, 2007), 8 U.S.C. § 1182(a)(3)(B)(iv)(VI) applies to the support the plaintiff provided, allegedly under duress, to a

1 terrorist organization as described in 8 U.S.C. § 1182(a)(3)(B)(vi)(III).

2 4. USCIS *sua sponte* reopened the I-485 application and the I-730 petitions on  
3 January 29, 2008 and provided the plaintiff 87 days to submit whatever materials and legal  
4 argument he wishes to USCIS in support of his application for adjustment of status (Form I-485  
5 application) and asylee petitions (I-730 petitions). Plaintiff is currently preparing his submission.

6 5. Accordingly, in order to allow sufficient time for Plaintiff to file his response, and  
7 for Defendants to issue their decision, the parties respectfully request that, pursuant to their  
8 stipulation, the Court extend the date of the Case Management Conference until May 23, 2008 at  
9 1:30 p.m. and set May 16, 2008 as the deadline for filing an updated joint case management  
10 statement.

11 DATED: March 21, 2008

Respectfully submitted,

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14 ROBERT B. JOBE  
15 Law Office of Robert B. Jobe  
Attorney for Plaintiff

16 DATED: March 21, 2008

SCOTT N. SCHOOLS  
United States Attorney

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19 EDWARD A. OLSEN  
20 Assistant United States Attorney  
21 Attorneys for Defendants  
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**[PROPOSED] ORDER**

Pursuant to stipulation, IT IS HEREBY ORDERED that the Case Management Conference be reset to May 23, 2008 at 1:30 p.m. and an updated joint case management conference statement shall be due by May 16, 2008.

IT IS SO ORDERED.

DATED: March 24, 2008

